

The Honorable John H. Chun

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

LYNESHA COOK, an individual,

Plaintiff,

v.

LOUIS DeJOY, POSTMASTER GENERAL
OF THE UNITED STATES POSTAL
SERVICE,

Defendant.

CASE NO. 2:21-cv-01651-JHC

STIPULATED MOTION TO EXTEND
PRETRIAL DATES

Noted for Consideration:
January 3, 2023

JOINT STIPULATION

The parties hereby jointly STIPULATE AND AGREE to extend the following pretrial deadlines as set forth in the Court's March 7, 2022 Order Setting Trial Date and Related Dates (Dkt. 19):

<u>Deadline</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
Disclosure of expert testimony under FRCP 26(a)(2) due	1/18/23	2/17/23
Deadline for filing motions related to discovery	2/17/23	3/20/23

Discovery completed by	3/20/23	4/18/23
Dispositive motions must be filed by	4/18/23	5/2/23

Good cause exists for extending the expert disclosure date (and by necessity, the dates that follow) by approximately one month because the parties await medical records from providers Plaintiff contends support her request for light duty work (a key fact at issue in the case) and/or her claim for emotional distress. The parties recently stipulated to release of seminal records and document requests made pursuant to that stipulation are pending with at least two providers. Because these records may impact the parties' election to retain expert witnesses, a short extension of time to allow for receipt and review of these records is warranted. Importantly, this extension will not impact the remaining deadlines set forth in the Court's initial scheduling order. For the reasons set forth above, the parties believe that there is good cause to request extension of these pretrial dates, and request that the Court grant their motion.

SO STIPULATED.

DATED this 3rd day of January, 2023.

NICHOLAS W. BROWN
United States Attorney

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Attorney for Plaintiff

Attorneys for Defendant

ORDER

The parties having so stipulated and agreed, it is hereby **ORDERED** that the pretrial deadlines set forth respectively above, be so extended.

DATED this 4th day of January, 2023.



JOHN H. CHUN

United States District Judge